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Attorneys for Chapter 7 Trustee
RONALD KOTOSHIRODO

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF HAWAII

In re:) CASE NO. 06-00898
JAMES WILLIAM LULL,) (Chapter 7)
Debtor) MOTION FOR ORDER
) AUTHORIZING SETTLEMENT
) WITH BRONSTER HOSHIBATA, A
) LAW CORP.; DECLARATION OF
) RONALD K. KOTORSHIRODO
)
) HEARING DATE: March 12, 2009
) TIME: 9:30 a.m.
) JUDGE: Honorable Lloyd King

MOTION FOR ORDER AUTHORIZING SETTLEMENT
WITH BRONSTER HOSHIBATA, A LAW CORP.

Chapter 7 Trustee Ronald K. Kotoshirodo (“Trustee”) of the Estate of the
above named Debtor JAMES WILLIAM LULL (“Debtor”), moves this Court for

an order pursuant to Rule 9019(a) of the Federal Rules of Bankruptcy Procedure approving a settlement with Bronster Hoshibata, A Law Corp. (“Bronster”).

This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. This motion is brought pursuant to Bankruptcy Rules 9013, 9014, 9019(a) and LBR 9013-1(c). In support of this motion, the Trustee respectfully states as follows:

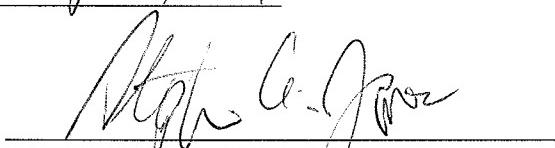
By this motion, the Trustee seeks approval of a compromise settlement with Bronster. The Trustee advised Bronster of a potential preference claim for \$3,000.00 which the Debtor paid Bronster shortly before the Debtor’s bankruptcy petition was filed, and which appeared to be on account of the Debtor’s antecedent debt to Bronster for legal services. Trustee’s counsel then had informal settlement discussions with Bronster concerning the claim and Bronster’s potential defenses (ordinary course payment under sec. 547(c)(2) and/or contemporaneous transfer under sec. 547(c)(1)).

Through settlement discussions, the parties reached a good faith compromise which would resolve the matter efficiently without the expense and delay of litigation, and without any admission of liability whatsoever. Under this compromise settlement, Bronster pays the Trustee \$1,500.00 in settlement of this claim.

The estate will benefit by resolving the matter without further expense. In view of the small amount of the claim versus the costs of litigation, the Trustee believes that the settlement is reasonable, fair and in the best interests of the estate. Declaration of Ronald K. Kotoshirodo, attached hereto.

The Trustee therefore respectfully moves for an order approving his proposed compromise of this claim in return for Bronster's payment of \$1,500.00.

DATED: Honolulu, Hawaii, January 30, 2009.



STEPHEN A. JONES
MICHAEL A. LILLY
Attorneys for Chapter 7 Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF HAWAII

In re:) CASE NO. 06-00898
) (Chapter 7)
JAMES WILLIAM LULL,)
)
 Debtor)
)

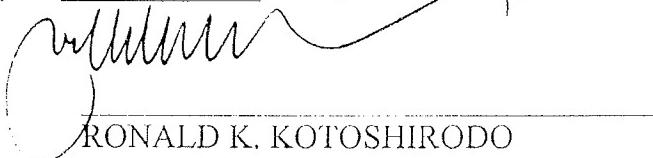
DECLARATION OF RONALD K. KOTOSHIRODO

I, RONALD K. KOTOSHIRODO, hereby declare as follows:

1. I am the duly appointed and acting Trustee of the bankruptcy estate of JAMES WILLIAM LULL, the above-named Debtor.
2. I was appointed as Chapter 7 Trustee in this case by Notice of Appointment of Interim Trustee dated December 12, 2006.
3. I make this declaration in support of my Motion for Order Authorizing Settlement with Bronster Hoshibata, A Law Corp. (the "Motion").
4. I believe that the settlement is reasonable, fair and in the best interests of the estate.

I declare under penalty of perjury under the laws of the State of Hawaii and the United States that the foregoing is true and correct.

Executed this 2nd day of February 2009, in Honolulu, Hawaii.


RONALD K. KOTOSHIRODO